

DAYLE ELIESON  
United States Attorney  
District of Nevada  
TINA NAICKER, CSBN 252766  
Special Assistant United States Attorney  
160 Spear Street, Suite 800  
San Francisco, California 94105  
Telephone: (415) 268-5611  
Facsimile: (415) 744-0134  
E-Mail: Tina.Naicker@SSA.gov

Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

TIMOTHY CASEY,

Plaintiff,

v.

NANCY A. BERRYHILL,  
Acting Commissioner of Social Security,

Defendant.

Case No. 2:18-cv-00546-JAD-GWF

**JOINT STIPULATION FOR EXTENSION OF  
TIME AND [PROPOSED ORDER]**

**(FIRST REQUEST)**

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for responding to Plaintiff's Motion for Remand be extended from September 21, 2018 to **October 29, 2018**. This is Defendant's first request for extension. Good cause exists to grant Defendant's request for extension. Counsel was recently out on intermittent medical leave and bereavement leave for the past few months. Counsel had three deaths in her family over the past three months, in June, July and August. Counsel also has over 75+ active matters, which requires two or more dispositive motions a week until November. In addition, Counsel has active civil rights and representative misconduct matters that require immediate investigation and a Ninth Circuit brief due on October 1, 2018, which requires multiple levels of review. Due to Counsel's unexpected leave,

1 Counsel became behind on her heavy workload. As such, Counsel needs additional time to adequately  
2 review the transcript and properly respond to Plaintiff's Motion for Remand. Counsel for Defendant  
3 was out of the office from September 7, 2018 through September 9, 2018 and expected out of the  
4 office again on September 21, 2018 through September 27, 2018. Defendant makes this request in  
5 good faith with no intention to unduly delay the proceedings. The parties further stipulate that the  
6 Court's Scheduling Order shall be modified accordingly.  
7

8 Respectfully submitted,

9 Dated: September 14, 2018

/s/ \*Young Cho  
(\*as authorized by email on September 14, 2018)  
YOUNG CHO  
Attorney for Plaintiff

13 Dated: September 14, 2018

DAYLE ELIESON  
United States Attorney  
DEBORAH LEE STACHEL  
Regional Chief Counsel, Region IX  
Social Security Administration

17 By /s/ Tina L. Naicker  
18 TINA L. NAICKER  
19 Special Assistant U.S. Attorney  
Attorneys for Defendant

20 **ORDER**

22 APPROVED AND SO ORDERED:

24 DATED: 9/17/2018

  
HON. GEORGE FOLEY, JR.  
UNITED STATES MAGISTRATE JUDGE